



TELEPHONE AND HIGH-SPEED INTERNET SERVICE

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February 6, 2006

Via Electronic Filing

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street
Washington, D.C. 02554

Re: EB-06-TC-060, BrahmaCom, Inc.'s Certification of CPNI Filing (February 6, 2006)

Dear Ms. Dortch:

In accordance with the directive of the Enforcement Bureau ("Bureau") as published in Public Notice, DA 06-233, dated January 30, 2006, enclosed please find the response of BrahmaCom, Inc. ("BrahmaCom").

BrahmaCom's filing includes its annual Customer Proprietary Network Information ("CPNI") compliance certificate as required by Section 64.2009(e) of the Code of Federal Regulations as well as BrahmaCom's statement of CPNI operating procedures.

If you have any questions, please do not hesitate to contact me.

Sincerely,

E. Barlow Keener
President, BrahmaCom, Inc.

Enclosures

cc: Byron McCoy, Telecommunications Consumer Division, Enforcement Bureau

BrahmaCom, Inc.

CERTIFICATION OF COMPLIANCE

I, E. Barlow Keener, hereby certify on this 6th day of February 2006 that I am the President of BrahmaCom, Inc. ("BrahmaCom") and that I am authorized to execute this certificate on behalf of BrahmaCom.

I have personal knowledge of the Customer Proprietary Network Information ("CPNI") operating procedures that have been established for BrahmaCom and such procedures are adequate to ensure compliance with 47 U.S.C. § 222 and associated FCC rules.



E. Barlow Keener
President, BrahmaCom, Inc.

**Statement of Customer Proprietary Network Information (“CPNI”)
Operating Procedures**

Pursuant to 47 C.F.R. Sec. 64.2009, BrahmaCom has the following procedures in place:

- a) BrahmaCom has implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.
- (b) BrahmaCom has trained its personnel as to when they are and are not authorized to use CPNI, and carriers must have an express disciplinary process in place.
- (c) BrahmaCom maintains a record of its sales and marketing campaigns that use customers' CPNI. BrahmaCom maintains records of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. BrahmaCom retains the records for a minimum of one year.
- (d) BrahmaCom has established a supervisory review process regarding carrier compliance with the CPNI rules for outbound marketing situations and maintain records of compliance for one year. BrahmaCom sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval.
- (e) BrahmaCom’s officer has established operating procedures that are adequate to ensure compliance with the CPNI rules.